

Kondreck, Robert

From: Willman, Jerry <Jerry.Willman@Illinois.gov>
Sent: Friday, July 10, 2020 11:57 AM
To: Ribordy, Michael
Cc: Mendoza, Ramon; Kondreck, Robert
Subject: RE: Nelson Knitting - 909 S Main St, Rockford, IL

Please accept this transmittal as notification that the State of Illinois does not have funds to address immediate concerns at this site and would encourage U.S. EPA to respond as necessary.

Thank you!

From: Ribordy, Michael <ribordy.mike@epa.gov>
Sent: Tuesday, July 7, 2020 10:47 AM
To: Willman, Jerry <Jerry.Willman@Illinois.gov>
Cc: Mendoza, Ramon <mendoza.ramon@epa.gov>; Kondreck, Robert <kondreck.robert@epa.gov>
Subject: [External] FW: Nelson Knitting - 909 S Main St, Rockford, IL

Jerry, have you had time to look into this one. Just wondering if the state is ok with us looking into this site, and if so, is there a state point of contact we should be working with?

Thanks

From: Ribordy, Michael
Sent: Tuesday, June 30, 2020 2:20 PM
To: Jerry Willman <jerry.willman@illinois.gov>
Subject: FW: Nelson Knitting - 909 S Main St, Rockford, IL

Hi Jerry, hope all is well with you and the family. We received the following correspondence from the City of Rockford. An different email from today made it sound like John Richardson's group is also involved with this site and he may have talked to you. Does the state have any plans for this site or are you thinking a potential removal referral?

Thanks

From: Mendoza, Ramon <mendoza.ramon@epa.gov>
Sent: Monday, June 29, 2020 11:36 AM
To: Ribordy, Michael <ribordy.mike@epa.gov>
Subject: FW: Nelson Knitting - 909 S Main St, Rockford, IL

Hello Mike, This is the Site I mentioned at the meeting. Classic Asbestos on the ground site. Neighborhood is low income too.

Sincerely,
Ramon

From: Robert Wilhelmi <Robert.Wilhelmi@rockfordil.gov>
Sent: Monday, June 29, 2020 10:16 AM
To: Mendoza, Ramon <mendoza.ramon@epa.gov>

Cc: Cragan, Keary <cragan.keary@epa.gov>; Karl Franzen <Karl.Franzen@rockfordil.gov>; Nelson Sjostrom <Nelson.Sjostrom@rockfordil.gov>; Mike Rotolo <Mike.Rotolo@rockfordil.gov>; Brian Bracken <Brian.Bracken@rockfordil.gov>; Chad Baker <Chad.Baker@rockfordil.gov>
Subject: Nelson Knitting - 909 S Main St, Rockford, IL

Hello Ramon – It was nice talking to you this morning. Thank you very much for listening to situation we have going. Below is a summary of our communications with Illinois EPA stating there isn't much for them here along with another email we sent to them last Friday after our inspection. A location map is also attached so you will see the proximity to the public park, historic Tinker Swiss Cottage historical site, and also residential dwellings in the surrounding neighborhood. Here is a summary of what we know to date:

The building has sat vacant since 1990 and has significantly deteriorated over the last 13 years since I performed a Phase I ESA on it in July of 2008 for the Rockford Park District who has interest in the building at that time. It is privately owned by a local architect and very little has been done to maintain the integrity of the building. It is frequently accessed by homeless and other unauthorized individual and is immediately adjacent to a public park, residential dwelling, and our historic Tinker Swiss Cottage and Museum Center. An area map is attached with the property highlighted.

When I performed the Phase I ESA back in 2008, I was provided a 1992 Phase I Report to review as part of mine that was completed by Regulatory Compliance Associates (RCA). The RCA report states that *"numerous runs of steam pipes were observed to be wrapped with presume asbestos pipe insulation and the obsolete Kewanee Boiler was observed to have a probable asbestos cement jacket."* The report also states that *"there were no indication of previous on-site disposal of any material containing regulated levels of asbestos"* at that time. During my 2008 site reconnaissance, I observed an abundance of overhead piping wrapped with suspected asbestos containing material (Aircel) and 2 large boilers with a jacket covering, consistent with typical mag-block asbestos insulation for boilers. The boiler room also contained several steam pipes and breechings with suspected asbestos on the steam pipes runs (Aircel) and pipe elbows (mudded). Additionally, Sanborn maps identify the building as having a ***"sheet rock and poured asbestos roof,"*** which according to reputable roofing contracts was most likely a poured gypsum that was blended with asbestos for fireproofing and insulations properties. Around 2008, I was told by the former curator at Tinker Swiss Cottage that a local individual that reclaims building materials had been in the building with a work crew and was removing wood and scrap metal, which drew some concern but I was never able to access the building to validate.

Fast forward 13 years to June 25, 2020. I was driving past the building and observed that its southern entrance had been compromised. Knowing the City has forthcoming Building and Property Maintenance Code cases on the property, I wanted to observe the interior conditions and screen for hazards before our building inspectors enter, as I am 40-Hr HAZWOPPER certified. As you can see from the pictures below, I observed that the boiler room had been completely gutted and all boilers and steam piping removed. The first 5 pictures below are ones that I took in 2008 documenting the condition of the boiler room and other areas containing suspect asbestos materials. The 1992 RCA report stated that all 3 boilers had a jacket covering but I only recall the 2 large Kewanee Boilers (silver) having it. The following 3 pictures are ones I took on the 25th of the boiler room in its current state. Please note the suspected asbestos materials on the floor and around the former base of the salvaged boilers. When I returned to the office, I verified that there was no Asbestos 10 Day Notification on file for the property, which heightened our concern. Additionally, I spoke with the gentleman that completed the salvage work around 2008 and he stated that he *"hired someone to come in and remove all the scrap metal and boilers back before scrap prices dropped"* circa September 2008. As you can see, we not only have concern about what was left in the boiler room and throughout the building as a result of the salvage operation but also where the materials identified in the 1992 and 2008 reports ultimately ended up. I have the full 2008 Phase I report that I can provide. Another major concern we have is the roofing systems, which I observed failing in multiple locations. If the roof systems still consists of *"sheet rock and poured asbestos,"* this adds another potential exposure risk to the surrounding public.

We will be mobilizing back to the property this morning to officially condemn and secure the building and placard it with a red "X" that notifies our first responders that hazardous conditions exist inside. I will also be able to get a better look

at the materials on the floor of the boiler room as I will have the appropriate PPE to enter the room. We would very much appreciate Illinois EPA's assistance in looking into the suspected NESHAP violations and potential threat to human health and the surrounding environment. We also would like to work in partnerships as we move forward with our forthcoming circuit court case on the building code violations, as there will be some degree of overlap with potential cleanup requirements and the building repairs or demolition that may be needed. We can also provide you with the contact information for the building owner and the contractor that reclaimed the building materials back in 2008. If you need to reach me today, please call my cell at Not responsive - Ex. 6. Thank you.

On Friday, June 26, 2020, myself and members from our building department revisited the property with property PPE and officially condemned it. We also placarded the entrances with a red "X" that notifies our first responders that hazardous conditions exist inside. With the proper PPE, were able to take a more detailed looks at the entire building. We were astonished at the negligence we encountered upon our detailed walk through. **You can access photos of what we witnessed at the following link:** <https://photos.app.goo.gl/SM3vrNzrLCibzcUj7>. As you can see, we were able to locate the formerly intact asbestos in the building, as it has been removed from all the salvaged steel and boilers and piled is several locations. Please note the black garbage bags filled with Aircel and jacket insulation hidden in the corner of the boiler room. Also, please note the massive pile on lower level and the fiber drums filled with pipe wrap. These same fiber drums are visible in my 2008 pictures as containing fluorescent lamps. In one area we located a pile of asbestos immediately next to a make-shift bead for what we presume was a homeless individual. The suspected asbestos poured roofing material is collapsing into the interior throughout the upper level of the structure well. I spoke with the new curator of Tinker Swiss Cottage today that stated the owner approached them last fall and tried to sell the property. After they declined his offer, , he made a comment that he would probably just walk away from it. I checked for delinquent property taxes after hearing this and the 2017, 2018, and first installment of the 2019 taxes have not been paid. After 3 years of delinquent taxes, our county tax trustee program will typically take back the property and auction it off. I have already reached out to the Trustee Program and recommend that they do not acquire the property and that it remains in the current owners name. Our concerns are that the roof and damaged asbestos containing materials are potentially being released to the surrounding area and that if the roof were to collapse or building were to catch fire, the exposure risk with substantially increase. We also fear that the owner does not have the kind of assets to perform this level of cleanup or demolition. We stepped in and secured the building on the 26th to ensure nobody would re-enter it. I will work with our local fire department to see if we can get some drone shots of the roof to better document the exposure risk. As we move forward with our Circuit Court case for the building code violations, we would more than welcome to with USEPA in partnership as there will be some degree of overlap with potential cleanup requirements and the building repairs or demolition that may be required. The building owner contact information is as follows. I will work on obtaining a contact number for the individual.

Owner Name and Address

COOK, JOHN R III
909 S MAIN ST
ROCKFORD, IL 61101

Tax Information

COOK, JOHN R III
C/O JOHN R COOK ASSOC 861 N MADISON ST
ROCKFORD, IL 61107

non responsive - exemption 6









Mr. Wilhelmi,

At this time there is no renovation or demolition activity occurring the Asbestos Unit will not get involved. At this time it seems the best course of action is to discuss with Bureau of Land staff, and perhaps USEPA, the issues at the site and the potential for a time critical removal action. I have added John Richardson, Bureau of Land Field Operations Section Manager, to route this email to the appropriate staff within BOL for this discussion.

Thanks

Ron Robeen

Field Operations Section Manager
Illinois EPA, Bureau of Air
1021 N. Grand Ave. East, MC #41
Springfield Illinois 62702
Phone: 217/524-0229
Fax: 217/782-1875

ron.robeen@illinois.gov

 Please consider the environment before printing this email

From: Robert Wilhelmi <Robert.Wilhelmi@rockfordil.gov>

Sent: Friday, June 26, 2020 9:21 AM

To: Brusky, Peter <Peter.Brusky@illinois.gov>

Cc: Retzlaff, Dave <Dave.Retzlaff@Illinois.gov>; Nelson Sjostrom <Nelson.Sjostrom@rockfordil.gov>; Brian Bracken <Brian.Bracken@rockfordil.gov>; Chad Baker <Chad.Baker@rockfordil.gov>; Chad Holaday <Chad.Holaday@rockfordil.gov>; Karl Franzen <Karl.Franzen@rockfordil.gov>

Subject: [External] FW: Nelson Knitting Concerns

Good Morning Peter,

I hope this email finds you well. Dave Retzlaff from our local IEPA Regional Office forwarded me over to you regarding what we at the City are considering a potential threat to human health and the environment as it relates to the former Nelson Knitting Building, located at 909 S. Main Street in Rockford. The building has sat vacant since 1990 and has significantly deteriorated over the last 13 years since I performed a Phase I ESA on it. It is privately owned and very little has been done to maintain the integrity of the building. It is frequently accessed by homeless and other unauthorized individual and is immediately adjacent to a public park, residential dwelling, and our historic Tinker Swiss Cottage and Museum Center. An area map is attached with the property highlighted.

When I performed the Phase I ESA back in 2007, I was provided a 1992 Phase I Report to review as part of mine that was completed by Regulatory Compliance Associates (RCA). The RCA report states that *"numerous runs of steam pipes were observed to be wrapped with presume asbestos pipe insulation and the obsolete Kewanee Boiler was observed to have a probable asbestos cement jacket."* The report also states that *"there were no indication of previous on-site disposal of any material containing regulated levels of asbestos"* at that time. During my 2007 site reconnaissance, I observed an abundance of overhead piping wrapped with suspected asbestos containing material (Aircel) and 2 large boilers with a jacket covering, consistent with typical mag-block asbestos insulation for boilers. The boiler room also contained several steam pipes and breachings with suspected asbestos on the steam pipes runs (Aircel) and pipe elbows (mudded). Additionally, Sanborn maps identify the building as having a *"sheet rock and poured asbestos roof,"* which is a roof system I have not encountered before. Around 2008, I was told by the former curator at Tinker Swiss Cottage

that a local individual that reclaims building materials had been in the building with a work crew and was removing wood and scrap metal, which drew some concern but I was never able to access the building to validate.

Fast forward 13 years to yesterday, I was driving past the building and observed that its southern entrance had been compromised. Knowing the City has forthcoming Building and Property Maintenance Code cases on the property, I wanted to observe the interior conditions and screen for hazards before our inspectors enter the building, as I am 40-Hr HAZWOPPER certified. As you can see from the pictures below, the boiler room has been completely gutted and all boilers and steam piping removed. The first 5 pictures below are ones that I took in 2007 documenting the condition of the boiler room and other areas containing suspect asbestos materials. The 1992 RCA report stated that all 3 boilers had a jacket covering but I only recall the 2 large Kewanee Boilers (silver) having it. The following 3 pictures are ones I took yesterday of the boiler room in its current conditions. Please note the suspected asbestos materials on the floor and around the former base of the salvaged boilers. When I returned to the office, I verified that there was no Asbestos 10 Day Notification on file for the property, which elevated our concern. Additionally, I spoke with the gentleman that completed the salvage work around 2008 and he stated that he *"hired someone to come in and remove all the scrap metal and boilers back before scrap prices dropped"* circa 2008. As you can see, we not only have concern about what was left in the boiler room and throughout the building as a result of the salvage operation but also where the materials identified in the 1992 and 2007 reports ultimately ended up. I can send you the 2007 Phase I report and will also pull the full set of original pictures that didn't make it into the report to see if there is anything else relevant. Another item we now have concern with is the roofing systems, which I observed failing in multiple locations. If the roof systems still consists of *"sheet rock and poured asbestos,"* this adds another potential exposure risk to the surrounding public.

We will be mobilizing back to the property this morning to officially condemn and secure the building and placard it with a red "X" that notifies our first responders that hazardous conditions exist inside. I will also be able to get a better look at the materials on the floor of the boiler room as I will have the appropriate PPE to enter the room. We would very much appreciate Illinois EPA's assistance in looking into the suspected NESHAP violations and potential threat to human health and the surrounding environment. We also would like to work in partnerships as we move forward with our forthcoming circuit court case on the building code violations, as there will be some degree of overlap with potential cleanup requirements and the building repairs or demolition that may be needed. We can also provide you with the contact information for the building owner and the contractor that reclaimed the building materials back in 2008. If you need to reach me today, please call my cell at [redacted] Thank you.















ROBERT WILHELMI | Brownfields Redevelopment Specialist



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The opinions expressed here are my own and do not necessarily represent those of the City of Rockford, IL.

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